

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRANK QUAGLIA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-10460-RWZ
)	
BRAVO NETWORKS, NATIONAL)	
BROADCASTING COMPANY, INC.,)	
doing business as NBC, RAINBOW)	
PROGRAMMING HOLDINGS, INC.)	
and DOES 1-10,)	
)	
Defendants.)	

ADDENDUM TO PLAINTIFF'S MAY 31, 2005 MOTION, ie, Plaintiff's Motion To Compel Defendants To Provide The Following:

1. Full disclosure of Profit and Loss...The It Factor generated...

How much money did *The It Factor* (TIF) generate?

A. Advertising Revenues: TIF aired for 409 half-hours. Each half hour show had seven minutes of commercial advertising, which translates to 2,863 minutes of commercial airtime sold. If Bravo averaged \$5,000 per commercial minute, Bravo would have generated advertising revenues of \$14,315,000. (Plaintiff has no idea if \$5,000 average per commercial minute is a high or low projection.)

B. Product Placement: Networks commonly profit from product placement by showing actors drinking from a Coke bottle, holding a Dunkin' Donuts cup, wearing a Nike logo, etc. How much revenue did Bravo generate during TIF airtime from product placement?

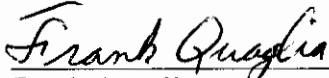
C. Merchandising: Did Defendants market any products or services related to TIF? If so, how much revenue did Bravo's merchandising efforts generate?

The Defendants made decisions to air *The It Factor* 409 times (including reruns) week after week, month after month, for two seasons. Did Defendants base these decisions upon concrete ratings and revenues or did they flip a coin?

2. All Raw Video Footage (unedited) taken for the NYC premiere episode of TIF.

- A. Raw footage for episode 1 of The It Factor is critical to the Plaintiff and may provide indisputable evidence for all three claims against the Defendant's.
- B. Zanzibar may already have VHS copies of all raw footage available to them and could allow Defendants to provide them to Plaintiff for a 30 day period.

respectfully submitted,



Frank Quaglia, *pro se*

June 17, 2005

Judge Rya W. Zobel